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March 25, 2022

By ECF

Magistrate Judge James R. Cho
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Chow v. SentosaCare, LLC et al.*, No. 1:19-cv-03541-FB-JRC
Response To Defendants' Improper Letter Regarding Deposition of Rita Skolkin

Dear Judge Cho,

Plaintiffs respectfully request that the Court strike Defendants' March 25, 2022 letter.

The parties did meet and confer on March 24, 2022 regarding the continuation of Rita Skolkin's deposition and Defendants' meritless position that it should be afforded the opportunity not just to continue the March 23, 2022 deposition but to also re-depose Ms. Skolkin. However, Defendants' refuse to comply in good faith with Your Honor's Individual Rule F.4, which requires that the parties submit a jointly composed single letter. As reflected in the attached email (Exhibit 1), Defendants provided their portion of the letter after 6:00 pm yesterday, demanding that Plaintiff provide his portion by noon today. As Plaintiff explained in last night's email, Defendants' demand that Plaintiff respond to their letter within two business hours after receipt is unprofessional, discourteous, and contrary to the intent of Your Honor's joint letter writing rule. Plaintiff also explained that no one from his counsel's firm is available today to draft our part of the joint letter, including because Defendants' dilatory and unprofessional discovery actions forced the parties to hold numerous depositions, sometimes more than one a day, in the last days of the discovery period, which required Plaintiff's counsel to postpone other work which now requires urgent attention.

Plaintiff intends on providing to Defendants his part of the joint letter reasonably soon. Defendants will likely want to then edit their part of the letter in response, as has happened in connection with previous joint letters. Discovery is over, there are no impending deadlines, and there is simply no good faith reason for Defendants to have acted precipitously and in contravention of Your Honor's rules.

We thank the Court for its attention.

Very truly yours,

/s/ D. Greg Blankinship
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